

From: Shuai Wang

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[01/28/2024]

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CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

To: THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF
DELAWARE

[824 North Market Street, 3rd Floor, Wilmington, Delaware 19801]

Re: Case No. 22-11068 (JTD) - Ref. No. 6283 - Motion to Contest FTX Claim Amount

Dear Court,

I am writing to address **Case No. 22-11068 (JTD)**, specifically in reference to **Ref. No. 6283**. I am submitting this written motion to contest the claim amount presented by FTX. I request the court to reject FTX's claimed amount based on the following facts, maintain my original claim amount, and compel FTX to update my TRX asset balance and proceed with the rightful claim. The details of the two disputed transactions are as follows:

1、 Transaction Quantity: **3,120,581.202484** TRX

TxID: **308499dc89c5b012a3b51a49b76d2978b60d683a50e654c363694755bd4718df**

2、 Transaction Quantity: **199** TRX

TxID: **a19cf41968ad462802ce1a9717743451051caadf1705b62615fedc8e94ed730b**

Grounds for Objection:

1、 **TPJTj6VArkKL8qKScpeSUTkx2gfTCKc5Jc** is the exclusive TRX deposit address for my account with FTX, as evidenced by the attached records of previous successful transactions. I believe FTX can verify this information internally.

2、 All TRX assets deposited to the aforementioned address unequivocally belong to my personal deposits. This is a consensus widely recognized, and FTX's transaction records, including TxID for chain verification, support this.

3、 The reason for the non-posting of my last two deposits is attributed to FTX being in a tumultuous period. In reality, assets remained in the address **TPJTj6VArkKL8qKScpeSUTkx2gfTCKc5Jc** until last year when FTX consolidated the assets after my additional claim submission. However, I fail to comprehend why my asset balance was not updated, and my claim amount was rejected. This is an issue on the part of FTX, and I strongly urge a timely correction.

4、 Attachment 2 is the withdrawal record from my Gate exchange account, clearly indicating the success of the two unaccounted deposits, similar to previously processed transactions, all originating from the same Gate account to **TPJTj6VArkKL8qKScpeSUTkx2gfTCKc5Jc**. Attachment 1 comprises FTX deposit records containing TxIDs, which can be verified on the blockchain at <https://tronscan.org/>. The blockchain records unmistakably show the transfer details for the same TxID, but the last two transactions did not reflect in my FTX balance.

5、 Additional attachments provide visual screenshots that explicitly display the unprocessed data for better clarity.


Based on the aforementioned facts and evidence, I respectfully request the court to:

- 1、 Reject the claimed amount by FTX in the filed documents.
- 2、 Maintain my previously asserted claim amount.
- 3、 Instruct FTX to update my TRX asset balance and proceed with the rightful claim.

I trust the court will impartially consider the details of this case and make a fair judgment. Thank you for your time and attention.

Sincerely,

[Shuai Wang]



01.28.2024

FTX-Deposits

	Time	Coin	Amount	Status	Additional info	Transaction ID
31528141	2022-11-10T13:50:07.666279+00:00	TRX	565965.8896	confirmed		4a9618fe30115d10420eb8803af439010f6d82ab412b18d9454890f3526e8120
31527973	2022-11-10T13:30:59.689614+00:00	TRX	587616.449743	confirmed		aef6f30967bcb47afdd8e05fb899915f2caa43ff8b14dd0c4cb26e83b123de77
31527863	2022-11-10T13:19:57.663264+00:00	TRX	0.000001	confirmed		f2b9aee1ee2aafedd5dca4408fd829a387dcd98087b56edf9efbd585beb2da5a
31527836	2022-11-10T13:16:56.667542+00:00	TRX	406870.51	confirmed		af4e084fdea80f4c88cd8ce0d8928b814444ee57cbf986c4eda174866e0943c4
31527748	2022-11-10T13:08:34.680342+00:00	TRX	0.000006	confirmed		8093b7e2de8b0936bca8a69e75f02dbe528e71d33d8dba6f7d54b8cc5efc4c12
31527746	2022-11-10T13:08:01.679311+00:00	TRX	0.000006	confirmed		4dda6fb5a55fd587465d793cbaf5967d35c86609048b135f6e6800fe38e5d964
31527704	2022-11-10T13:03:00.660549+00:00	TRX	529453.13	confirmed		498993548bd57e8da367d1378513587700eb90e47c426a0e26d70e47a3469e7f1
13374485	2021-12-11T09:22:58.587394+00:00	FTT	50.05380406	confirmed		0x51ca38a1a7211478068098bcc9cd6739efc84f474c2cdac714a6392cc7158161

Gate-Withdrawals

Order ID	Time	Network	Address	TxID	Coin	Amount	Trading Fee	Amount Received	Status
30565366	2022-11-10 21:37:56	TRX	TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc	308499dc89c5b012a3b51a49b76d2978b60d683a50e654c363694755bd4718df	TRX	3120581.202484	1	3120581.202484	Success
30565062	2022-11-10 21:18:48	TRX	TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc	a19cf41998ad462802ce199717743451051caad17058402615fedc8e94ed730b	TRX	200	1	199	Success
30553812	2022-11-10 13:27:35	TRX	TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc	aef6f30967bcb47afdd8e05fb899915f2caa43ff8b14dd0c4cb26e83b123de77	TRX	587616.449743	1	587616.449743	Success
30553381	2022-11-10 13:13:20	TRX	TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc	af4e084fdea80f4c88cd8ce0d8928b814444ee57cbf986c4eda174866e0943c4	TRX	406870.51	1	406870.51	Success
30552804	2022-11-10 12:56:13	TRX	TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc	498993548bd57e8da367d1378513587700eb90e47c426a0e26d70e47a3469e7f1	TRX	529453.13	1	529453.13	Success

Transaction 308499dc89c5b012a3b51a49b76d2978b60d683a50e654c363694755bd4718df

tronscan.org/#/transaction/308499dc89c5b012a3b51a49b76d2978b60d683a50e654c363694755bd4718df

TRONSCAN

TRX: 0.112 USD

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Register Log In Connect Wallet

Transaction Details

Account TBA6CypYjizwA9XdC7Ubgc5F1bxxQ75qPt transferred 3,120,581.202484 TRX to TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc

Hash: 308499dc89c5b012a3b51a49b76d2978b60d683a50e654c363694755bd4718df

Result: SUCCESSFUL

Status: CONFIRMED Confirmed for over 200 blocks

Confirmed SRS: 19 BinanceStaking Ant Investment Group TRONALLIANCE Intelligence Quant

Block: 45844775

Time: 443 days 21 hrs ago 2022-11-10 21:39:12 (UTC)

Resources Consumed & Fee: 268 Bandwidth

Overview

From: TBA6CypYjizwA9XdC7Ubgc5F1bxxQ75qPt

To: TPJTj6VArKfL8qKScpeSUTxx2gFTCKc5Jc

Amount: 3,120,581.202484 TRX

Transaction a19cf41968ad462802ce1a9717743451051caadf1705b62615fedc8e94ed730b

TRONSCAN Home Blockchain Tokens Data Governance TRON Ecosystem Developers More

TRX: 0.112 USD (+0.51%)

Register Log In Connect Wallet

Transaction Details

Account TBA6CypYjizwA9XdC7Ubgc5F1bxxQ7SqPt transferred 199 TRX to TPJTj6VArkkL8qKScpeSUTxx2gITCKc5Jc

- Hash: a19cf41968ad462802ce1a9717743451051caadf1705b62615fedc8e94ed730b
- Result: SUCCESSFUL
- Status: CONFIRMED Confirmed by over 200 blocks
- Confirmed SRS: 19 JD Investment BinanceStaking Ant Investment Group TRONALLIANCE
- Block: 45844396
- Time: 443 days 21 hrs ago 2022-11-10 21:20:15 (UTC)
- Resources Consumed & Fee: 266 Bandwidth

Overview

From:	TBA6CypYjizwA9XdC7Ubgc5F1bxxQ7SqPt Gate
To:	TPJTj6VArkkL8qKScpeSUTxx2gITCKc5Jc
Amount:	199 TRX

Transaction db7d1d8211891436a1dfe75202e0420317c097106b0f6c85ae26af8ee596089d

TRONSCAN Home Blockchain Tokens Data Governance TRON Ecosystem Developers More

TRX: 0.112 USD (+0.51%)

Register Log In Connect Wallet

Transaction Details

Account TPJTj6VArkkL8qKScpeSUTxx2gITCKc5Jc transferred 3,113,206.020557 TRX to TYoZM8LALfUqm4EXzB7oKmwqusWtXTBhY6

- Hash: db7d1d8211891436a1dfe75202e0420317c097106b0f6c85ae26af8ee596089d
- Result: SUCCESSFUL
- Status: CONFIRMED Confirmed by over 200 blocks
- Confirmed SRS: 19 BlockAnalysis BlockchainOrg TRONALLIANCE JD Investment
- Block: 55867349
- Time: 95 days 7 hrs ago 2023-10-25 11:35:06 (UTC)
- Resources Consumed & Fee: 270 Bandwidth

Overview

From:	TPJTj6VArkkL8qKScpeSUTxx2gITCKc5Jc
To:	TYoZM8LALfUqm4EXzB7oKmwqusWtXTBhY6
Amount:	3,113,206.020557 TRX

My Account - Buy/Sell Bitcoin x +

gate.io/myaccount/withdrawals

Gate.io Exchange Web3 Buy Crypto Prices Trade Derivatives Finance Bots Copy Institutional | Wallet Order @ Q

Funds Overview Deposits & Withdrawals Withdraw

Spot Isolated Margin Futures Account Copy Trading Financial Options Payment Transaction History Deposits & Withdrawals GT Holding Account Statement Audits

Withdrawal

Onchain Withdrawal

Chain TRX 2022-06-01 → 2023-01-31 Search

ID	Date	Amount	TXID	Status	Address	Fee	Network	Confirmations
30565356	2022-11-11 05:37:56	TRX	TP3Tj...CK2SjC...306A8...471dnt	Success	TRX 3120582.2024841	3120581.202484	Bitcoin	
30565062	2022-11-11 05:18:48	TRX	TP3Tj...CK2SjC...a12et...c93798	Success	TRX 200	1	199	Success
30553812	2022-11-10 21:27:35	TRX	TP3Tj...CK2SjC...aefel...23da77	Success	TRX 587617.449743	1	587616.449743	Success
30553381	2022-11-10 21:13:20	TRX	TP3Tj...CK2SjC...aefel...1a43e4	Success	TRX 406871.51	1	406870.51	Success
30552804	2022-11-10 20:56:13	TRX	TP3Tj...CK2SjC...aefel...1a43e4	Success	TRX 529454.13	1	529453.13	Success

FTX Cryptocurrency Exchange x +

claims.ftx.com/wallet

- STEP 1
- Initiate Account Owner Authentication
- STEP 2
- Verify Identity of the Original FTX Account Owner
- STEP 3
- KYC
- STEP 4
- Review Account Balances
- View your FTX account -- you can view your balances as of the Petition Date (unless otherwise noted), and historical activity.
- STEP 5
- Submission of Electronic Proof of Claim
- STEP 6

Portfolio

MAIN ACCOUNT

Download All Core Transactions

Transactions will be downloaded for the user's main account or the currently selected subaccount. Not include additional balance adjustments. Please download these using the adjustments tab.

Balances Deposits Withdrawals Positions Fills P2P Transfers Airdrops Referral Rebate

Deposits

Amount	Status
565,965.6896 TRX	Confirmed 4a96181e301f5d10420eb8803af4390101d82ab412b18d7454890f3526e8120
587,616.449743 TRX	Confirmed aef5f50967bcb47afcd8e05fb899915f2caa43ff6b14dd0c4cb26e83b123de77
0.000001 TRX	Confirmed f2b9aee1ae2aafend5dca4408fd829a387dcd78087b56ed99efbd585beb2da5a
406,870.51 TRX	Confirmed af6e064cdea501ac88cd3ced8928b61a44ee57cb1966c4eda174866e0943c4
0.000006 TRX	Confirmed 8093b7e2de8b0936bca8a69e75f02dne528e71d33d8dba617d54b8cc5efc4e12
0.000006 TRX	Confirmed 4cdca5f3a55f0587e65a773cbaf59a7d35c86609048f35fbee200e38e5d964
529,453.13 TRX	Confirmed 498993548bd57e8de567d1378513587700eb90e47c476a0e26d70e47a5468a7f
50.05380406	Confirmed

Account ID 68794296
Email vansua@qq.com
Platform FTX_COM

SETTINGS

LOGOUT

FTX Trading Ltd. 22-11068 (JTD)
Twelfth Omnibus Claim Objection
Schedule 1 - Modified Claims

Asserted Claims						Modified Claims	
Claim Number	Name	Debtor	Tickers	Ticker Quantity		Debtor	Ticker Quantity
41065	Wang, Shuai	FTX Trading Ltd.	BTC	10.0000000000000000		FTX Trading Ltd.	10.0000000000000000
			ETH	100.0000000000000000		FTX Trading Ltd.	100.0000000000000000
			FTT	10,050.0538040600000000		FTX Trading Ltd.	10,050.0538040600000000
			TRX	3,120,780.9818400000000000		FTX Trading Ltd.	0.7793560000000000
			USDT	164,193.5247549760000000		FTX Trading Ltd.	164,193.5247549760000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat grossly overstate the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.

CANADA
POSTPOSTES
CANADA

EMS

1

Xpresspost^{TM/MC} - USA
É.-U.

From/De :

SHUAI WANG
11691 Aztec St
Richmond BC V6X 1H9
CanadaPostage paid / Port payé
00177814

Date

2024 01 28

Gross Weight / Poids brut
0.045 kgInsured Value / Valeur assurée
\$1.00 CAD

Postage Rate / Tarif d'affranchissement

To/À :

Tel No. N° de tél.:
3022522900

\$35.73 CAD

Transaction No. / N° de transaction
0108180552Non-Delivery Instructions
Instructions de non-livraisonreturn at sender's expense
renvoyer aux frais de l'expéditeurTHE UNITED STATES BANKRUPTCY COURT
824 N MARKET ST
WILMINGTON DE 19801
UNITED STATES
3rd Floor

See Commercial Invoice CN23 Attached Voir la facture commerciale ou le CN23 adjoint

USPS SIGNATURE TRACKINGTM #

EM 106 423 813 CA

Sender warrants that this item does not contain non-mailable matter.
L'expéditeur garantit que cet envoi ne contient pas d'objet inadmissible.RPDS/PDVS V2303.0.261
Shipping LabelSPEC 3697 V3
Étiquette d'expédition

matelassée

lightweight

Imperméable et anti-déchirure
Pl autocollant

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